

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

FILED

2015 OCT 28 PM 3:54

UNITED STATES OF AMERICA,

Plaintiff,

V.

MONICA VELASCO (13),

Defendant.

SEALED

NO. EP-15-CR-0228-DB-13

STATE OF TEXAS,
COUNTY OF DALLAS.

REPLY

**GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant is charged with the following offenses: **CT 1:** 18:1962(d) – CONSPIRACY TO CONDUCT THE AFFAIRS OF AN ENTERPRISE THROUGH A PATTERN OF RACKETEERING ACTIVITY (RICO); **CT 2:** 21:846 & 841(a)(1) – CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE; **CT 3:** 21:963 – CONSPIRACY TO IMPORT A CONTROLLED SUBSTANCE; and **CTS 4-5:** 18:1956 – CONSPIRACY TO LAUNDER MONETARY INSTRUMENTS. Defendant faces a minimum mandatory term of imprisonment of ten years to life on the drug-trafficking crimes and a life sentence on the RICO charge.

2. Defendant is a United States citizen; however, defendant has strong ties to Mexico, and, as such, presents a high risk of fleeing to avoid prosecution on this charge.

Moreover, there is a presumption that Defendant presents a high risk of fleeing to avoid prosecution on this charge, and the facts and circumstances of this case support this fact.

3. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

4. There are no conditions or combination of conditions which will reasonably assure the safety of the community should Defendant be released on bond.

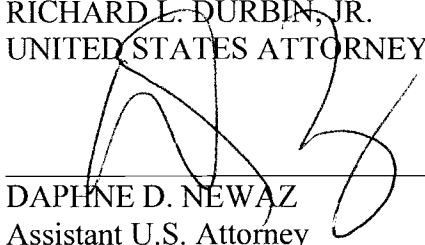
The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

By:



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